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Ms. Thomasina Real Bird
Fredericks Peebles & Morgan LLP
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VIA EMAIL ONLY: trealbird@ndnlaw.com

**RE: APPLICATION TO THE SOUTH DAKOTA PUBLIC UTILITIES
COMMISSION FOR A PERMIT FOR THE DAKOTA ACCESS PIPELINE
UNDER THE ENERGY CONVERSION AND TRANSMISSION FACILITY ACT;
HP14-002
Our file: 0300**

Dear Ms. Real Bird:

We are in receipt of your July 27, 2015 correspondence. Answers to your follow up questions are as follows:

INTERROGATORY NO. 47:

A. Is the Dakota Access Pipeline expected to connect to the Energy Transfer Crude Oil Pipeline?

ANSWER: Objection, the requested information is irrelevant. Without waiving the objection, yes.

B. Is crude oil from the Dakota Access pipeline expected to be transported through the Energy Transfer Crude Oil pipeline?

ANSWER: Objection, the requested information is irrelevant. Without waiving the objection, yes.

INTERROGATORY NO. 48:

A. What is the status of construction and/or conversion and/or operation of the ETCO pipeline?

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ANSWER: Objection, the requested information is irrelevant. Without waiving the objection: Trunkline Gas Company is currently performing the abandonment of the pipeline to be acquired by ETCO and bi-weekly reports regarding the abandonment are currently being filed with the FERC in Docket No. CP12-491-000.

B. If this pipeline is not already operational, when is the expected date of operation?

ANSWER: Objection, the requested information is irrelevant. Without waiving the objection: Assuming the receipt of the necessary regulatory approvals, construction of the ETCO pipeline is anticipated to commence in the fourth quarter of 2015, with an in-service date of the fourth quarter of 2016. (pulled from the ETCO application with the ICC)

INTERROGATORY NO. 51: Where are the various points of destination along the pipeline as referred to on DAPL's website?

ANSWER: Objection, the requested information is irrelevant and calls for speculation. Without waiving the objection: The only destination on DAPL is currently the multiple points/terminal hub at Patoka, Illinois. If there were a market justification for the establishment of other potential points of destination along the pipeline, it is possible that DAPL would establish such points of destination in the future.

INTERROGATORY NO. 52: To your knowledge, what is/are the planned destination(s) for the product transported by the proposed pipeline, at which the product will be refined?

ANSWER: Objection, the requested information is irrelevant and calls for speculation. Without waiving the objection, DAPL delivers to the crude oil terminalling hub at Patoka, Illinois, from where that crude oil can reach refineries throughout the Midwest and the Gulf Coast through other pipeline systems. DAPL anticipates refineries in those areas are likely to be significant refining markets for the crude oil transported by DAPL. Thus, as the transporter of the crude oil, DAPL does not have knowledge of which of the specific refineries will actually refine the crude oil that it transports.

INTERROGATORY NO. 54:

1. What is test water, what is its purpose, and how is it used?

ANSWER: Test water refers to the water used for hydrostatically testing of the completed pipeline. Water is pressurized using high pressure pumps. Testing of completed pipeline is performed in accordance with CFR 195 Subpart E and company specifications.

2. What type of testing requires water as indicated by your answer?

ANSWER: See above

3. How is water "pushed?"

ANSWER: The test water is moved from one section to other sections using pipeline pigs and compressed air.

4. What is a test segment?

ANSWER: A length of pipe being hydrostatically tested.

5. What is a test section and how does it differ from a test segment?

ANSWER: They are the same.

6. Is testing the only activity or use the proposed project will have for water?

ANSWER: No, water is required for horizontal directional drills.

7. What is hydrostatic testing? What does it consist of? What are the byproducts of this process?

ANSWER: Hydrostatic testing insures the integrity of the completed pipeline. Using pressurized water at a minimum of 125% of the maximum operating pressure. There are no byproducts

8. What is trench dewatering? What does it consist of? What are the byproducts of this process?

ANSWER: See the SWPPP plan and documents filed with the PUC.

9. What are considered appropriate energy dissipating devices?

ANSWER: See the SWPPP plan and documents filed with the PUC.

10. What are considered appropriate discharge structures?

ANSWER: See the SWPPP plan and documents filed with the PUC.

11. How is discharge monitored?

ANSWER: See the SWPPP plan and documents filed with the PUC.

INTERROGATORY NO. 60: Identify what goods and in what quantities the "\$486 million" assertion of "goods and services will be procured from local businesses along the entire route" is based on.

ANSWER: See attached Exhibit A.

INTERROGATORY NO. 61:

How is the share of Bakken oil production that Dakota Access plans to transport by pipeline currently being transported, and by whom?

ANSWER: Objection. The requested information is irrelevant and calls for speculation. Dakota Access is not able to provide additional information.

INTERROGATORY NO. 62:

- B. How many workers will be temporarily located in a particular town at a time?
- C. Have you identified lodging for these workers?
- D. If not, how do you know adequate lodging exists at these locations?

ANSWER: Objection. Requires speculation. Dakota Access restates its previous answer.

Very truly yours,

MAY, ADAM, GERDES & THOMPSON LLP



KARA C. SEMMLER

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Enclosure